

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

2012 NOV -8 AM 10:00

CLERK
SO. DIST. OF GA.

WILLIAM H. CARTER
Plaintiff

vs

NCO FINANCIAL SYSTEMS
Defendant

Case No: CV 311-107

**ADDENDUM TO PLAINTIFF'S MOTION TO QUASH AND REQUEST FOR
PROTECTIVE ORDER PREVENTING THE DEPOSITION OF AMANDA CARTER**

**PLAINTIFF'S CERTIFICATION OF
CONFERRAL IN GOOD FAITH**

Plaintiff hereby certifies that he conferred in good faith both by written and verbal communication with Counsel's for the Defendant, Keren Gesund and Ken Grace before filing his Motion to Quash and Request for Protective Order Preventing the Deposition of Amanda Carter.

Plaintiff conferred via email correspondence with Keren Gesund on October 30, 2012. Ms. Gesund did not answer Plaintiff's email. On October 31, 2012 Plaintiff was contacted by Ken Grace informing him that Mr. Grace would be lead counsel and Plaintiff discussed the subject during the telephone conversation. Mr. Grace said he would review the matter and "get back" to Plaintiff with his answer as to whether or not Defendant would object. Due to the time constraint involved in the matter, Plaintiff called Mr. Grace back when he had not "gotten back" to him by 4:30 pm on Friday, November 2, 2012. Plaintiff explained to Mr. Grace that he needed an answer

as he would have to get the paper work in the mail to the court before the post office closed at 5pm. Mr. Grace said Defendant would object to the motion.

Plaintiff further takes this opportunity to certify that he did indeed have similar conversations with counsels for the Defendant before filing ANY prior motions in this case including his Motion to Compel even though the contents of those conversations have not been fully disclosed by Defendant.

November 4, 2012

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "William H. Carter", is written over a horizontal line.

William H. Carter
311 Bethel Street
Eastman, Georgia 31023
478-689-0708

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Plaintiff

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NCO FINANCIAL SYSTEMS
Defendant

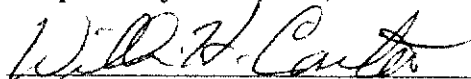
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CERTIFICATE OF SERVICE

This is to certify that I have mailed copies of the above document(s) by first class mail USPS to all parties listed below.

Dated: 11-4-2012

Respectfully Submitted,



William H. Carter
311 Bethel Street
Eastman, Georgia
31023

NCO FINANCIAL SYSTEMS, INC.
C/O Glenn E. Jones
Hall, Booth, Smith & Slover, P.C.
3528 Darien Highway, Suite 300
Brunswick, Georgia 31525



MACON P8DC XX 310
MON 05 NOV 2012 PM

Clerk of Court
P.O. Box 1130
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